

From: Tim Kintner [mailto:TKintner@bankerstrust.com]
Sent: Monday, September 11, 2006 10:52 AM
To: Comments
Subject: RIN 3064-AD09 Assessments

Dear Regulator:

My comment pertains to the proposed deposit risk-premium structure as it applies to de novo banks, both future de novo's and those already established. Bankers Trust Company, NA in Cedar Rapids was established on 12/16/02. My bank became profitable on a monthly basis after 16 months of operation and generated an annual profit in its second year. Monthly profits have continued every month since then. After 3 ½ years of operation, Bankers Trust has grown to more than \$200 million in total assets.

I understand that assessing depository risk premiums should correlate to the risk level of the institution. However, beyond looking at the CAMELS ratings (which are already reflective of the risk of a new institution), I don't believe that penalizing new banks by virtue of their newness alone is justified. In addition, this proposal would result in a very significant new penalty on existing de novo banks in a magnitude that doesn't appear reasonable. For my bank, this modified rule would result in approximately \$70,000 in additional deposit insurance premiums per year, continuing yearly for the arbitrary seven years in the proposal. For these reasons, I respectfully request that the nature of this "de novo penalty" be reviewed and either dropped or changed significantly.

Sincerely,
Tim R. Kintner

Timothy R. Kintner
President & CEO
Bankers Trust Company
221 3rd. Ave. SE
Cedar Rapids, IA 52401
(319)896-7799 phone
(319)366-0509 fax

